

# **EXHIBIT B**

# **Singular Computing LLC v. Google LLC**

Civil Action No. 1:19-cv-12551-FDS  
Hon. F. Dennis Saylor IV  
March 31, 2021



## “execution unit”

### Google’s Claim Differentiation Argument

- **Claim 53 & 25 = no different scope: *FALSE***
- **Claim 25 = locally accessible memory**

**25.** The device of claim 1, wherein the at least one LPHDR execution unit comprises at least five hundred locally connected LPHDR execution units, wherein **the device includes memory locally accessible** to at least one of the LPHDR execution units, and wherein the device is implemented on a silicon chip using digital technology.

*'273 patent at Claim 25*

### **Locally accessible memory ≠ memory**

## “execution unit”

### Not all embodiments have memory paired: **FALSE**

- *EVERY* embodiment has memory paired

**Fig. 6 = arithmetic unit, not execution unit**

FIG. 6 is an example design for an LPHDR arithmetic unit according to one embodiment of the present invention.

'273 patent, 2:60-61

**Fig. 4 = execution unit**

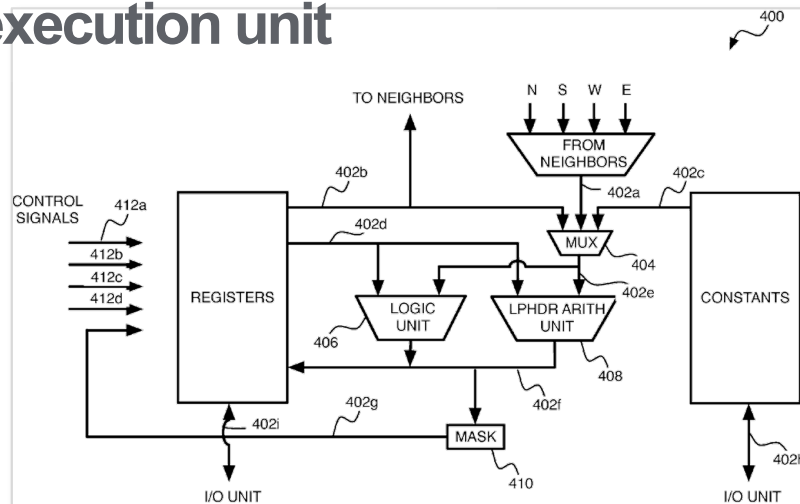


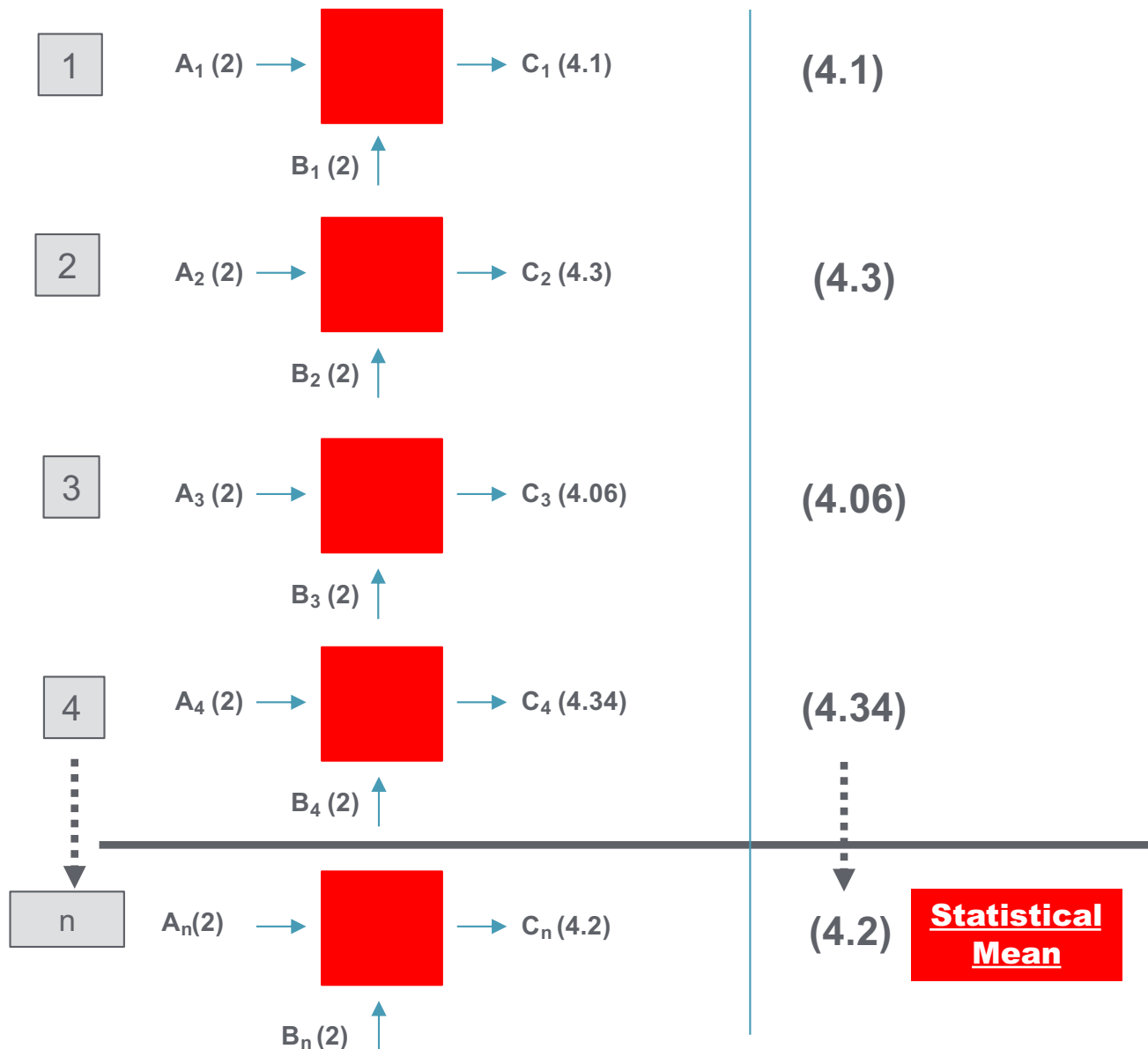
FIG. 4 shows an example design for a PE 400 (which may be used to implement any one or more of the PEs in the PEA 104). The PE 400 stores local data. The amount of memory for the local data varies significantly from design to design. It

'273 patent at 10:34-36

'273 patent at Fig. 4

“[When] the patent describes multiple embodiments, every claim does not need to cover every embodiment.”

# Repeated Execution Example



$$2 * 2 = 4.0$$

$$4.2 - 4 = 0.2$$

$$0.2 \div 4 = 0.05$$

-Repeat for all valid inputs

-If 5% of executions are mathematically wrong by 0.05%  $\rightarrow$  INFRINGE

**Statistical Mean**